REMARKS

Claim Amendments

Claims 1-2, 7-8, 11-13, 17, 20-23, 25-26, 29, 32-34, 36, 40, 45, 48, and 50-53 are amended herein.

Claim Objections

Claims 11-16, 25-27 and 36-39 were objected to but were considered allowable if rewritten into independent form including all of the limitations of the base claims and any intervening claims. Claims 11-13, 25, 26, and 36 have been amended to include the limitations of base claims 1, 17 and 29, respectively, and so are believed to be in condition for allowance. Accordingly, Applicant respectfully requests allowance of claims 11-16, 25-27 and 36-39.

Claim Rejections Under 35 U.S.C. § 102

Claims 1-2, 8-10, 17, 28-29, 35, 40, 43, 47-48 and 53 were rejected under 35 U.S.C. § 102(b) as being anticipated by Robinson et al. (U.S. Patent No. 6,279,069). Applicant respectfully traverses this rejection and feels that claims 1-2, 8-10, 17, 28-29, 35, 40, 43, 47-48 and 53, as amended, are allowable for the following reasons.

Applicant respectfully maintain that Robinson et al. only discloses a Flash memory device that reads configuration parameters from a query mode ROM 31 and uses the configuration parameters to configure the low level driver to interface to the Flash memory devices or array. The Applicant respectfully maintains that Robinson et al. does not teach or disclose reading a device ID and/or manufacturer code to discover the memory type and configuring a device driver based on the discovered memory type. *See, e.g.*, Robinson et al., Abstract; column 5, lines 23-33; column 3, line 17 to column 4, line 67.

Applicant therefore respectfully submits that Robinson et al. does not teach or disclose a method of operating a memory device driver comprising querying at least one memory device to discover the memory type by reading a memory ID code stored in the memory device, and configuring the driver to access the at least one memory device according to the discovered memory type. Applicant thus respectfully submits that Robinson et al. does not teach or disclose all elements of the Applicant's claimed invention.

Applicant's claim 1, as amended, recites, "[a] method of operating a memory device driver comprising: querying at least one memory device to discover the memory type by reading a memory ID code stored in the memory device; and configuring the driver to access the at least one memory device according to the discovered memory type." As detailed above, Applicant submits that Robinson et al. fails to teach or disclose such a method of operating a memory device driver by querying a memory device to read a device ID and configuring the device driver to access the memory device according to the device ID. As such, Robinson et al. fails to teach or disclose all elements of independent claim 1.

Applicant's claim 17, as amended, recites, "A method of operating a system comprising: querying at least one Flash memory device coupled to a host to discover the memory type by reading a device ID and/or manufacturer code stored in the Flash memory device; and configuring a driver routine executing on the host to access the at least one Flash memory device according to the discovered memory type." As detailed above, Applicant submits that Robinson et al. fails to teach or disclose such a method of operating a system. As such, Robinson et al. fails to teach or disclose all elements of independent claim 17.

Applicant's claim 29, as amended, recites, "A method of configuring a driver comprising: querying at least one Flash memory device to read a device ID and/or manufacturer code stored in the Flash memory device to discover the memory type; and configuring the driver to access the at least one memory device according to the discovered memory type." As detailed above, Applicant submits that Robinson et al. fails to teach or disclose such a method of configuring a driver. As such, Robinson et al. fails to teach or disclose all elements of independent claim 29.

Applicant's claim 40, as amended, recites, "A system comprising: at least one Flash memory device; and a host coupled to the at least one Flash memory device, wherein the host is adapted to query the at least one Flash memory device to read a device ID and/or manufacturer code stored in the Flash memory device and configure a driver routine to access the at least one Flash memory device in response to the query." As detailed above, Applicant submits that Robinson et al. fails to teach or disclose such a system that queries a Flash memory device to read a device ID and/or manufacturer code stored in the Flash memory device and configures a

driver routine to access the at least one Flash memory device in response to the query. As such, Robinson et al. fails to teach or disclose all elements of independent claim 40.

Applicant's claim 48, as amended, recites, "A machine-usable medium, the machine-usable medium containing a software routine for causing a processor to execute a method, wherein the method comprises: querying at least one Flash memory device to read a device ID and/or manufacturer code stored in the Flash memory device to discover the memory type; and configuring a driver to access the at least one Flash memory device according to the discovered memory type." As detailed above, Applicant submits that Robinson et al. fails to teach or disclose such a machine-usable medium and process. As such, Robinson et al. fails to teach or disclose all elements of independent claim 48.

Applicant's claim 53, as amended, recites, in part, "A system comprising: at least one Flash memory device; and a host coupled to the at least one Flash memory device, wherein the host comprises a means for detecting a Flash memory type of the at least one Flash memory device by reading a memory ID code stored in the Flash memory device and comprises a means for configuring a driver to access the at least one Flash memory device in response to the Flash memory type detected by the means for detecting." As detailed above, Applicant submits that Robinson et al. fails to teach or disclose such a system. As such, Robinson et al. fails to teach or disclose all elements of independent claim 53.

Applicant respectfully contends that claims 1, 17, 29, 40, 48, and 53 as pending have been shown to be patentably distinct from the cited reference of Robinson et al. As claims 2, 8-10, 28, 35, 43, and 47 depend from and further define claims 1, 17, 29, 40, and 48, respectively, they are also believed to be allowable. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 102(b) and allowance of claims 1-2, 8-10, 17, 28-29, 35, 40, 43, 47-48 and 53.

Claim Rejections Under 35 U.S.C. § 103

Claims 4, 23 and 34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Robinson et al.(U.S. Patent No. 6,279,069) and further in view of Langford et al. (U.S. Patent No. 6,907,496). Applicant respectfully traverses this rejection and feels that claims 4, 23 and 34 are allowable for the following reasons.

Applicant respectfully maintains, as stated above, that Robinson et al. only discloses a a Flash memory device that reads configuration parameters from a query mode ROM 31 and uses the configuration parameters to configure the low level driver to interface to the Flash memory devices or array. The Applicant respectfully maintains that Robinson et al. does not teach or disclose reading a device ID and/or manufacturer code to discover the memory type and configuring a device driver based on the discovered memory type. *See, e.g.*, Robinson et al., Abstract; column 5, lines 23-33; column 3, line 17 to column 4, line 67.

In addition, Applicant respectfully maintains that Langford et al. discloses a method of updating a flash memory that determines the configuration and size of a Flash memory for use in updating the flash memory. *See, e.g.*, Langford et al., Figure 4, Abstract; column 2, lines 6-11; column 3, line 41 to column 5, line 17.

Applicant thus respectfully submits that combining Robinson et al. with Langford et al. does not teach or suggest the Applicant's claimed invention, as maintained by the Examiner. Applicant therefore respectfully contends that Robinson et al. and Langford et al. do not teach or suggest all elements of Applicant's claims 1, 17, and 29, either alone or in combination.

Applicant respectfully contends that claims 1, 17, and 29 as pending have been shown to be patentably distinct from the cited references Robinson et al. and Langford et al., either alone or in combination. As claims 4, 23 and 34 depend from and further define claims 1, 17, and 29, respectively, they are also believed to be allowable. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a) and allowance of claims 4, 23 and 34.

Claims 5-7, 20-21, 32-33, 44-46 and 50-52 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Robinson et al. and further in view of Kasa et al. (U.S. Patent No. 6,275,412). Applicant respectfully traverses this rejection and feels that claims 5-7, 20-21, 32-33, 44-46 and 50-52 are allowable for the following reasons.

Applicant respectfully maintains, as stated above, that Robinson et al. only discloses a a Flash memory device that reads configuration parameters from a query mode ROM 31 and uses the configuration parameters to configure the low level driver to interface to the Flash memory devices or array. The Applicant respectfully maintains that Robinson et al. does not teach or

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disclose reading a device ID and/or manufacturer code to discover the memory type and

configuring a device driver based on the discovered memory type. *See, e.g.*, Robinson et al.,

Abstract; column 5, lines 23-33; column 3, line 17 to column 4, line 67.

In addition, Applicant respectfully maintains that Kasa et al. discloses an alterable

Common Flash Interface for a Flash memory which incorporates a 16 bit identification code to

allow a user to identify the manufacturer and operating parameters of the device. *See, e.g.*, Kasa

et al., Figures 10A and 10B, Abstract; column 11, line 56 to column 12, line 65.

Applicant thus respectfully submits that combining Robinson et al. with Kasa et al. does

not teach or suggest the Applicant's claimed invention, as maintained by the Examiner.

Applicant therefore respectfully contends that Robinson et al. and Kasa et al. do not teach or

suggest all elements of Applicant's claims 1, 17, 29, 40 and 48, either alone or in combination.

Applicant respectfully contends that claims 1, 17, 29, 40 and 48, as pending have been

shown to be patentably distinct from the cited references Robinson et al. and Kasa et al., either

alone or in combination. As claims 5-7, 20-21, 32-33, 44-46 and 50-52 depend from and further

define claims 1, 17, 29, 40 and 48, respectively, they are also believed to be allowable.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection

under 35 U.S.C. § 103(a) and allowance of claims 5-7, 20-21, 32-33, 44-46 and 50-52.

Claims 3, 18, 30 and 41 were rejected under 35 U.S.C. § 103(a) as being unpatentable

over Robinson et al. and further in view of Wong et al. (U.S. Patent No. 6,970,969). Claims 19,

31, 42 and 49 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Robinson et al.

and further in view of Parulski (U.S. Patent No. 6,650,366) and Battaglia et al. (U.S. Patent No.

6,987,927). Applicant respectfully traverses this rejection and feels that claims 3, 18-19, 30-31,

41-42 and 49 are allowable for the following reasons.

Applicant respectfully maintains, as stated above, that Robinson et al. only discloses a a

Flash memory device that reads configuration parameters from a query mode ROM 31 and uses

the configuration parameters to configure the low level driver to interface to the Flash memory

devices or array. The Applicant respectfully maintains that Robinson et al. does not teach or

disclose reading a device ID and/or manufacturer code to discover the memory type and

configuring a device driver based on the discovered memory type. *See, e.g.*, Robinson et al., Abstract; column 5, lines 23-33; column 3, line 17 to column 4, line 67.

In addition, Applicant respectfully maintains that Wong et al. discloses a multiple segment data structure and method to manage data in NAND and NOR architecture Flash memory device. *See, e.g.*, Wong et al., Abstract; column 8, lines 6-11.

Applicant also respectfully maintains that Parulski et al. discloses a digital still imaging system incorporates a PCMCIA-ATA interface. *See, e.g.*, Parulski et al., Abstract; column 4, lines 30-35.

Applicant further respectfully maintains that Battaglia et al. discloses a portable battery powered device for transferring data from a flash device to a large capacity digital storage device that incorporates a USB, Memorystick, and Multimedia card interfaces. *See, e.g.*, Battaglia et al., Abstract; column 16, lines 4-11; column 15, lines 2-6.

Applicant thus respectfully submits that combining Robinson et al. with Wong et al., Parulski et al, or Battaglia et al. does not teach or suggest the Applicant's claimed invention, as maintained by the Examiner. Applicant therefore respectfully contends that Robinson et al. and Wong et al., Parulski et al, or Battaglia et al. do not teach or suggest all elements of Applicant's claims 1, 17, 29, 40 and 48, either alone or in combination.

Applicant respectfully contends that claims 1, 17, 29, 40 and 48, as pending have been shown to be patentably distinct from the cited references Robinson et al. and Kasa et al., either alone or in combination. As claims 3, 18-19, 30-31, 41-42 and 49 depend from and further define claims 1, 17, 29, 40 and 48, respectively, they are also believed to be allowable. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a) and allowance of claims 3, 18-19, 30-31, 41-42 and 49.

CONCLUSION

In view of the above remarks, Applicant believes that all pending claims are in condition for allowance and respectfully requests a Notice of Allowance be issued in this case. Please charge any further fees deemed necessary or credit any overpayment to Deposit Account No. 501373.

If the Examiner has any questions or concerns regarding this application, please contact the undersigned at (612) 312-2207.

Respectfully submitted,

Date: 5/15/06

Andrew C. Walseth
Reg. No. 43,234

Attorneys for Applicant
Leffert Jay & Polglaze
P.O. Box 581009
Minneapolis, MN 55458-1009
T (612) 312-2200
F (612) 312-2250